

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Christopher Baxter fka Christopher J Baxter Debtor(s)	CHAPTER 13
Rocket Mortgage, LLC f/k/a Quicken Loans, LLC f/k/a Quicken Loans Inc. Movant	
vs.	NO. 21-11388 MDC
Christopher Baxter fka Christopher J Baxter Debtor(s)	
Kenneth E. West Esq. Trustee	11 U.S.C. Section 362

**MOTION OF ROCKET MORTGAGE, LLC FKA QUICKEN LOANS, LLC FKA
QUICKEN LOANS INC.
TO APPROVE COVID-19 PAYMENT DEFERRAL AGREEMENT**

1. Movant is Rocket Mortgage, LLC f/k/a Quicken Loans, LLC f/k/a Quicken Loans Inc.
2. Debtor(s) is the owner(s) of the premises 214 Harrison Ave, Glenside, PA 19038, hereinafter referred to as the mortgaged premises.
3. Movant is the holder of a mortgage, original principal amount of \$165,090.00 on the mortgaged premises that was executed on November 24, 2017. Said mortgage was recorded on November 30, 2017 in Instrument Number 2017090264. The Mortgage was subsequently assigned to Movant by way of Assignment of Mortgage recorded on June 21, 2021, in Instrument Number 2021071564 in Montgomery County.
4. Kenneth E. West Esq., is the Trustee appointed by the Court.
5. Debtor and Movant have entered into a COVID-19 Payment Deferral Agreement on March 22, 2022. A copy of COVID -19 Payment Deferral Agreement is attached hereto as Exhibit A.
6. Movant seeks Court approval of the COVID -19 Payment Deferral Agreement by way of the within this Motion, including an order stating that approval.

WHEREFORE, Movant prays that an Order be entered approving the COVID-19 Payment Deferral Agreement .

/s/ Rebecca A. Solarz, Esquire
Rebecca A. Solarz, Esquire
KML Law Group, P.C.

701 Market Street, Suite 5000
Philadelphia, PA 19106
Attorneys for Movant/Applicant
Main Phone #: 215-627-1322